

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.  
Darryl Dominic Woodford

Case No. Case: 2:21-mj-30551  
Assigned To : Unassigned  
Assign. Date : 11/18/2021  
Description: CMP USA v. SEALED  
MATTER (SO)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of approx. October 2014 - October 22, 2021 in the county of Wayne and elsewhere in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

*Offense Description*

18 USC § 2251(a)  
18 USC § 2252A(a)(5)(B)

Production, including attempt, of child pornography  
Possession of child pornography

This criminal complaint is based on these facts:  
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: November 18, 2021

City and state: Detroit, Michigan

  
Complainant's signature

Raymond C. Nichols, Special Agent (FBI)  
Printed name and title

  
Judge's signature

Hon. Jonathan J.C. Grey, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT  
AND ARREST WARRANT**

I, Raymond C. Nichols, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since February 2012 and am currently assigned to the FBI Detroit Division. Prior to being employed by the FBI, I obtained a bachelor's degree in computer information systems and was employed as a network/server administrator for approximately 9 years. While employed by the FBI, I have investigated federal criminal violations related to Internet fraud, computer intrusions, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.

2. I have received training in the area of child pornography and child exploitation and have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws. I am authorized by law to request an arrest warrant.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **DARRYL DOMINIC WOODFORD** (date of birth \*\*/\*\*/1995) for violations of 18 U.S.C. §§ 2251(a) (production of child pornography including attempt) and 2252A(a)(5)(B) (possession of child pornography).

4. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents/officers, information gathered from investigative sources of information, and my experience, training and background as a Special Agent. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that **WOODFORD** has violated 18 U.S.C. §§ 2251(a) and 2252A(a)(5)(B).

#### **PROBABLE CAUSE**

5. On May 29, 2020, I was contacted by Detective Sergeant Jonathan Walden of the Michigan State Police (MSP) regarding a report of enticement of minors in Van Buren Township, Michigan. The subject of the report was identified as **DARRYL DOMINIC WOODFORD**.

6. On June 3, 2020, myself and Detective Walden interviewed a female born in 1999 at the Michigan State Police Post in Taylor, Michigan. The female is referred to as MV1 to protect her identity. MV1 had met WOODFORD in 2012 when she was 13 years old. At that time WOODFORD told MV1 that he was 17 years old, but he was actually 18 years old. WOODFORD and MV1 would communicate through video chat on Skype and sometimes MV1 would appear wearing only lingerie. MV1 believed that WOODFORD had recorded some of their video chats. WOODFORD had asked MV1 to meetup with him to have sex, but she declined because she was only 13.

7. When MV1 was 17 years old she went to WOODFORD's home. There, the two engaged in consensual sex. WOODFORD secretly recorded a video of them engaged in intercourse by hiding a camera under a couch. WOODFORD had sent a screenshot of the video to MV1 via Snapchat on or about April 29, 2020. MV1 was not able to provide a copy of the screenshot or Snapchat messages at the time of her interview. MV1 provided names of other females, now adults, who may have had similar interactions with WOODFORD as minors.

8. From the time of MV1's interview through approximately September of 2020, myself and Detective Walden interviewed four other females who had some interaction with WOODFORD. One of those females met WOODFORD through social media when she was 13 years old. This female believed WOODFORD to be

17 or 18 years old at the time. WOODFORD attempted to take her to the movies, but they never went. She only talked to WOODFORD for approximately 1 week.

9. Other females interviewed by myself and Detective Walden described how WOODFORD stalked them, in one case showing up at a child's school and home requiring her parents to call the police. Many of the females described having their social media accounts "hacked" resulting in private images of themselves being stolen. They believed that WOODFORD had been the one to hack their accounts.

10. Based on statements provided by MV1 and interviews of other females Detective Walden obtained a search warrant for WOODFORD's residence located in Van Buren Township (Belleville), Michigan. The warrant was obtained from the 31<sup>st</sup> District Court for Wayne County. The warrant was executed by the Michigan State Police and FBI with assistance from the Van Buren Police Department on October 22, 2021.

11. On October 22, 2021 Detective Walden provided some of the items seized during the warrant to me for forensic analysis. One of those items was a Samsung smartphone (DEVICE1) which had been located in WOODFORD's bed. The device contained an ONN 256GB micro-SD card. The other item of interest was an HP laptop computer (DEVICE2) which was located in WOODFORD's bedroom.

12. I have reviewed DEVICE1 and DEVICE2, both of which together contained over 400 images and videos that meet the Federal definition of child pornography. The digital files described below were located on the SD card installed in DEVICE1:

- Julia\_8yo... - is an approximate 23-minute video that appears to depict a 4–5-year-old female. The female is completely nude throughout the video and depicted performing fellatio on an adult. The child is also depicted being anally penetrated by an adult male's penis.
- 7yo complacent... - is an approximate 8-minute video that appears to depict a 6–8-year-old clothed female performing fellatio on an adult. The child is later depicted nude from the waist down being penetrated by an adult penis.
- FRV4... - is an approximate 28 second video that appears to depict an approximate 5–6-year-old female completely nude. The child's vagina is penetrated by what appears to be an adult finger.

13. Located on the SD card of DEVICE1 was a series of images and videos of MV1 to include what appeared to be screen recording of Skype video calls. In one of those videos, which included MV1's name, and the date "2014-10-06" WOODFORD can be seen in the lower right corner. During the video MV1, at WOODFORD's direction, positions the camera to expose her bare vagina. Based on the date included in the file name, MV1 would have been 15 years old, while

WOODFORD would have been 20 years old. I was also able to locate a video that appears to depict MV1 and WOODFORD engaged in intercourse. The video appears to be the hidden video described by MV1 during her interview. Based on Metadata in that video, MV1 would have been 17 years old.

14. While reviewing data contained on the SD card of DEVICE1 I located a series of images and a video that appeared to depict an approximate 11–12-year-old female. In the video WOODFORD can be observed placing the camera in a room that appeared to be a cabin similar to those in campgrounds. After WOODFORD leaves the room the 11–12-year-old female (hereafter MV2) enters the room, and begins to undress, exposing her vagina to the camera. While undressed a second, slightly older female enters the room to undress. At the end of the video, immediately after the females have left the room, WOODFORD is observed picking up the camera. Metadata contained in the video indicated that it was created on July 19, 2020.

15. On the SD card located in DEVICE1 I located a series of images that appeared to depict an approximate 10–11-year-old female (MV3) in a bathroom. In some of the images what appears to be an adult male's sneakers are observed. Several of the images appear to depict the female nude from the waist down exposing her vagina. Metadata for these images was not recovered, however, filenames included "screenshot" and dates in 2018. Based on my training and experience I

believe the series of images were screenshots (still images) of a video and may have been captured in 2018 or earlier.

16. On November 17, 2021 I was able to meet with MV2's mother and father, who reside in Van Buren Township. They were able to identify MV2 and her sister in a series of sanitized photos taken from the video described above. MV2's parents were also able to determine that the photos were taken sometime in July of 2020 at the KOA campground in Monroe, Michigan where they had stayed with WOODFORD. MV2 was born in 2009 and her sister (the older female in the video) was born in 2007. The parents of MV2 were also able to identify MV3 as a friend of MV2. The bathroom depicted in the images of MV3 was in MV2's family home in Van Buren Township.


17. On November 17, 2021 I was able to meet with MV3's parents, who reside in Van Buren, Michigan. The parents were able to identify MV3 in sanitized photos described above. MV3 was born in 2009. When told that the photos were taken in MV2's bathroom, the parents told me that the photos had to be taken prior to or early in 2020 as MV3 had not been at that residence recently due to the pandemic. MV3 would have been 10 years old or younger in those photos.



## CONCLUSION

18. Based on the foregoing, there is probable cause to believe **DARRYL DOMINIC WOODFORD** has violated 18 U.S.C. §§ 2251(a) (production of child pornography including attempt) and 2252A(a)(5)(B) (possession of child pornography).

Respectfully submitted,

  
Raymond C. Nichols, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

  
HON. JONATHAN J.C. GREY  
UNITED STATES MAGISTRATE JUDGE

Date: November 18, 2021